



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Mr. Mike Nolan
Executive Vice President
Total Containment, Inc.
15 East Uwchlan
Exton, PA 19341

Dear Mr. Nolan:

This is in response to your communications with Dave O'Brien and Tom Schruben of my staff about your company's Total Containment Tank. You asked if this tank meets with EPA's final performance standards for new underground storage tanks provided in 40 CFR Part 280.20. It does.

This relatively new type of tank system uses a U.L. 58 steel tank shell and is surrounded by a secondary containment jacket that last fall passed the tests required by the Underwater Laboratories, Inc. These tests investigated the compatibility of the jacket material with petroleum products, alcohols, and alcohol-gasoline mixtures; other physical properties of the tank's construction materials' and the corrosion protection properties of the jacket system in protecting the steel tank shell from external corrosion in accordance with U.L. 1746. The documentation you provided from U.L., and our own calls to their offices, assure us that the Total Containment Tank is authorized to use the listing mark of Underwriters Laboratories, Inc. and is now eligible for U.L. follow-up inspection service.

Based on the above U.L. test results and our examination of the system's detailed specifications that you provided, we consider the system to meet the final performance standards for new tanks as provided for in section 280.20(a)(5).

Sincerely,

James McCormick, Director
Policy and Standards Division
Office of Underground Storage Tanks